

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

**FILED**

JUN 10 2021

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA           §  
  §  
v.   §   No. 4:21-CR-125  
  §   Judge Jordan  
ALFRED LEE MASSIE JR. (1)         §  
ID SIOMMONS MASSIE (2)           §  
ANTHONY WAYNE JONES JR. (3)     §

**FIRST SUPERSEDING INDICTMENT**

The United States Grand Jury charges:

**Count One**

Violation: 18 U.S.C. §§ 371, 922(u) & 2  
(Conspiracy to Steal Firearms from a Federally  
Licensed Firearms Dealer; Aiding and Abetting)

Beginning on or about April 10, 2021, the exact date being unknown to the Grand Jury, through and including the date of the filing of this indictment, in the Eastern District of Texas, and elsewhere, defendants, ALFRED LEE MASSIE JR., ID SIOMMONS MASSIE and ANTHONY WAYNE JONES JR., (hereinafter “coconspirators”) did knowingly and willfully combine, conspire and agree with each other and other persons known and unknown to the United States Grand Jury to knowingly steal, unlawfully take, and carry away firearms from the premises of a federally licensed firearms dealer, all of which had been previously shipped and transported in interstate commerce, in violation of 18 U.S.C. §§ 922(u) and 924(i)(1).

### **MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that the defendants, along with other persons known and unknown to the Grand Jury, would and did:

1. Recruit members to the conspiracy;
2. Identify a victim federally licensed firearms dealer which possessed firearms at its place of business;
3. Obtain entry into the premises of the federally licensed firearms dealer without permission;
4. Steal and remove a number of firearms from the business inventory of the federally licensed firearms dealer; and
5. Possess, conceal, store, barter, sell and dispose of the stolen firearms to actors known and unknown to the Grand Jury.

### **OVERT ACTS**

In furtherance of the conspiracy and to affect the objects thereof, the defendants, along with other persons known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Texas:

6. On or about April 19, 2021, the defendants and coconspirators drove the ALFRED MASSIE JR.'s black Chevy Impala to SK Arms, a federally licensed firearms dealer (FFL) located in Flower Mound, Denton County, Texas;
7. Thereafter, upon arrival, the defendants and coconspirators made unlawful entry into SK Arms by backing the Impala into and through the glass entryway;

8. Once inside, the defendants and coconspirators moved throughout the store, smashing display cases and retrieving firearms and firearms accessories; and
9. The defendants and coconspirators unlawfully stole, took and carried away the following firearms which were in the business inventory of SK Arms:
  - a. KEL-TEC, PMR-30, .22 caliber pistol, bearing serial number: WY0F40
  - b. TAURUS, GC3, 9mm pistol, bearing serial number: ACC653444
  - c. BERETTA, 92A1, 9mm pistol, bearing serial number: BIN017371
  - d. SMITH&WESSON, PC M&P SF, 9mm pistol, bearing serial number: JFS5435
  - e. GLOCK, G48 MOS, 9mm pistol, bearing serial number: BSNW335
  - f. GLOCK, G45, 9mm, bearing serial number: BTHA785
  - g. GLOCK, G44, 9mm pistol, bearing serial number: AFFV423
  - h. CZ, SHADOW 2, 9mm pistol, bearing serial number: F000309
  - i. HK, VP9L OR, 9mm pistol, bearing serial number: 238-009769
  - j. HK, P30S, 9mm pistol, bearing serial number: 129-095857
  - k. HK, VP9 Green, 9mm pistol, bearing serial number: 224-318173
  - l. HK, VP9 FDE, 9mm pistol, bearing serial number: 224-313606
  - m. HK, HK45-V1, .45 caliber pistol, bearing serial number: HKU-054116
  - n. ZEV TECHNOLOGIES, AR15-CE-30, .300 caliber AR pistol, bearing serial number: ZFL05003
  - o. EWS, E-15, .300 caliber AR pistol, bearing serial number: E15-00059

All in violation of 18 U.S.C. § 371 and 18 U.S.C. §§ 922(u) and 924(i)(1).

### **Count Two**

Violation: 18 U.S.C. §§ 371, 922(j) & 2  
(Conspiracy to Receive, Possess, Conceal and  
Dispose of Stolen Firearms; Aiding and  
Abetting)

Beginning on or about April 10, 2021, the exact date being unknown to the Grand Jury, through and including the date of the filing of this indictment, in the Eastern District of Texas, and elsewhere, defendants, ALFRED LEE MASSIE JR., ID SIOMMONS

MASSIE and ANTHONY WAYNE JONES JR., did knowingly and willfully combine, conspire and agree with each other and other persons known and unknown to the United States Grand Jury to knowingly receive, possess, conceal, store, barter, sell, and dispose of stolen firearms, all of which had been previously shipped and transported in interstate commerce, in violation of 18 U.S.C. §§ 922(j) and 924(a)(2).

### **MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that the defendants, along with other persons known and unknown to the Grand Jury, would and did:

1. The manner and means of the conspiracy are described in paragraphs 1 - 5 of Count One, which are incorporated herein.

### **OVERT ACTS**

In furtherance of the conspiracy and to affect the objects thereof, the defendants, along with other persons known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Texas:

2. The overt acts are described in paragraphs 6 - 9 of Count One, which are incorporated herein.

All in violation of 18 U.S.C. § 371 and 18 U.S.C. §§ 922(j) and 924(a)(2).

**Count Three**

Violation: 18 U.S.C. §§ 922(j) & 2  
(Possession of a Stolen Firearm or  
ammunition; Aiding and Abetting)

On or about April 19, 2021, in the Eastern District of Texas, the defendant,  
ALFRED LEE MASSIE JR., ID SIOMMONS MASSIE and ANTHONY WAYNE  
JONES JR., aided and abetted by each other and by others both known and unknown to  
the Grand Jury, knowingly received, possessed, concealed and stored stolen firearms, all  
of which had been previously shipped and transported in interstate commerce, while  
knowing and having reasonable cause to believe the firearms were stolen, in violation of  
18 U.S.C. §§ 922(j) & 2.

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**  
**Criminal Forfeiture Pursuant to 18 U.S.C. § 924(d)**

As a result of committing the felony offense in violation of 18 U.S.C. §§ 922(u)  
and (j) alleged in this First Superseding Indictment, defendants, ALFRED LEE MASSIE  
JR., ID SIOMMONS MASSIE and ANTHONY WAYNE JONES JR., shall forfeit to the  
United States, pursuant to 18 U.S.C. § 924(d), all firearms and ammunition involved in  
the offense, including but not limited to the following:

1. KEL-TEC, PMR-30, .22 caliber pistol, bearing serial number: WY0F40
2. TAURUS, GC3, 9mm pistol, bearing serial number: ACC653444
3. BERETTA, 92A1, 9mm pistol, bearing serial number: BIN017371
4. SMITH&WESSON, PC M&P SF, 9mm pistol, bearing serial number: JFS5435
5. GLOCK, G48 MOS, 9mm pistol, bearing serial number: BSNW335
6. GLOCK, G45, 9mm, bearing serial number: BTHA785
7. GLOCK, G44, 9mm pistol, bearing serial number: AFFV423

8. CZ, SHADOW 2, 9mm pistol, bearing serial number: F000309
9. HK, VP9L OR, 9mm pistol, bearing serial number: 238-009769
10. HK, P30S, 9mm pistol, bearing serial number: 129-095857
11. HK, VP9 Green, 9mm pistol, bearing serial number: 224-318173
12. HK, VP9 FDE, 9mm pistol, bearing serial number: 224-313606
13. HK, HK45-V1, .45 caliber pistol, bearing serial number: HKU-054116
14. ZEV TECHNOLOGIES, AR15-CE-30, .300 caliber AR pistol, bearing serial number: ZFL05003
15. EWS, E-15, .300 caliber AR pistol, bearing serial number: E15-00059
16. Any ammunition related to this case.

By virtue of the commission of the offenses alleged in this First Superseding Indictment, any and all interest the defendants have in the above-described property is vested in and forfeited to the United States.

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

NICHOLAS J. GANJEI  
ACTING UNITED STATES ATTORNEY

  
\_\_\_\_\_  
MATTHEW T. JOHNSON  
Assistant United States Attorney

Date: June 10, 2021.

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**NOTICE OF PENALTY**

**Counts One and Two**

Violation: 18 U.S.C. §§ 371, 922(u), 922(j) & 2

Penalty: Imprisonment of not more than 5 years, a fine not to exceed \$250,000, or both; a term of supervised release of not more than three years.

Special Assessment: \$ 100.00

**Count Three**

Violation: 18 U.S.C. § 922(j)

Penalty: Imprisonment for a term of not more than ten years and a fine of not more than \$250,000 or both; supervised release of not more than 3 years.

Special Assessment: \$100.00